

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT WINCHESTER**

<b>BIANCA CLAYBORNE, et al.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Case No.: 4:24-cv-00012</b>
<b>v.</b>	)	
	)	<b>Judge Clifton L. Corker</b>
<b>RUBEN BASALDUA, et al.,</b>	)	
	)	<b>JURY DEMANDED</b>
<b>Defendants.</b>	)	

**PLAINTIFFS' RESPONSE TO COUNTY'S MOTION TO FILE SUR-REPLY TO  
PLAINTIFFS' RESPONSE IN SUPPORT OF MOTION FOR LEAVE TO FILE  
AMENDED COMPLAINT**

Plaintiffs take no position on this motion.

DATED: February 10, 2025

Respectfully submitted,

/s/ Anthony A. Orlandi

Tricia R. Herzfeld (#26014)  
Anthony A. Orlandi (#33988)  
**HERZFELD SUETHOLZ GASTEL LENISKI  
AND WALL, PLLC**  
223 Rosa L. Parks Avenue, Suite 300  
Nashville, TN 37203  
Telephone: (615) 800-6225  
tricia@hsglawgroup.com  
tony@hsglawgroup.com

Abby R. Rubenfeld  
**Rubenfeld Law Office, PC**  
810 Dominican Drive, Ste. 215  
Nashville, TN 37228  
Telephone: (615) 386-9077  
arubenfeld@rubenfeldlaw.com

*Attorneys for Plaintiffs*

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served via electronic mail on this 10<sup>th</sup> day of February 2025 and by the Court's CM/ECF system which electronically served a copy to all counsel of record:

<p>Jeffrey R Thompson Gina Sarli Vogel Grant A. Carringer <b>Lewis Thomason, P.C.</b> 900 South Gay St., Ste. 300 P.O. Box 2425 Knoxville, TN 37901 865-546-4646 <a href="mailto:jrthompson@lewisthomason.com">jrthompson@lewisthomason.com</a> <a href="mailto:gvogel@lewisthomason.com">gvogel@lewisthomason.com</a> GCarringer@LewisThomason.com</p> <p><i>Attorneys for Coffee County Tennessee and Officer Crabtree</i></p>	<p>Daniel J. Ripper Chloe Kennedy Isabella Bombassi <b>Luther Anderson PLLP</b> P.O. Box 151 Chattanooga, Tennessee 37402 (423) 756-5034 <a href="mailto:dan@lutheranderson.com">dan@lutheranderson.com</a> <a href="mailto:cek@lutheranderson.com">cek@lutheranderson.com</a> <a href="mailto:bib@lutheranderson.com">bib@lutheranderson.com</a></p> <p><i>Attorney for Katlyn Pelham</i></p>
<p>Meghan Murphy Peako Jenkins <b>Office of the Tennessee Attorney General</b> P.O. Box 20207 Nashville, Tennessee 37202 Phone (615) 253-3890 <a href="mailto:meghan.murphy@ag.tn.gov">meghan.murphy@ag.tn.gov</a> <a href="mailto:Peako.Jenkins@ag.tn.gov">Peako.Jenkins@ag.tn.gov</a></p> <p>W. Adam Izell <b>Law Office of W. Adam Izell, PLLC</b> P.O. Box 4386 Chattanooga, TN 37405 Telephone: (423) 888-3022 adam@chattlawyer.com</p> <p><i>Attorneys for Ruben Basaldua, Donnie Clark, Douglas Foster, and James Thompson</i></p>	<p>Kristin Ellis Berexa Grace Patton <b>Farrar Bates Berexa</b> 12 Cadillac Drive, Ste. 480 Brentwood, TN 37207 Telephone: (615) 254-3060 <a href="mailto:kberexa@fbb.law">kberexa@fbb.law</a> gpatton@fbb.law</p> <p><i>Attorneys for Montana Medina</i></p>
<p>Arthur F. Knight III (Notice forthcoming) <b>Law Office of Arthur F. Knight III</b> 3248 Tazewell Pike, Suite 103 Knoxville, TN 37918 P: (865) 252-0430 <a href="mailto:arthur@arthurfknightlaw.com">arthur@arthurfknightlaw.com</a></p> <p><i>Attorney for Erica Wright-Gilliam</i></p>	

/s/ Anthony A. Orlandi  
Anthony A. Orlandi